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24
25 UNITED STATES DISTRICT COURT
26
27 DISTRICT OF NEVADA

28 KATHERINE SEARS and VIRGINIA
1 SEGANOS, individually, and on behalf of all
2 others similarly situated,

3 Plaintiffs,

4 vs.

5 MID VALLEY ENTERPRISES, LLC and
6 PAHRUMP ICS LLC, doing business as
7 “SHERI’S RANCH”

8 Defendants.

CASE NO. 2:19-cv-00532-APG-CWH

9 **STIPULATION AND ORDER TO
10 EXTEND TIME FOR PLAINTIFFS TO
11 RESPOND TO DEFENDANTS’
12 MOTION TO DISMISS AND FOR
13 DEFENDANTS TO REPLY**

14 **(SECOND REQUEST)**

15 Complaint Filed: March 29, 2019

1 On March 29, 2019, Plaintiffs KATHERINE SEARS and VIRGINIA SEGANOS
2 (“Plaintiffs”) filed a putative class and collective action complaint in the United States District
3 Court, District of Nevada (ECF No. 1);

4 On May 3, 2019, Defendants MID VALLEY ENTERPRISES, LLC and PAHRUMP ICS
5 LLC filed their First Motion to Dismiss Collective Action and Class Complaint with Jury
6 Demand (ECF No. “First Motion to Dismiss”);

7 On May 15, 2019, the Court granted the parties’ stipulation which provided Plaintiffs
8 with an additional seven (7) days to respond to Defendants’ First Motion to Dismiss, which fell
9 on May 24, 2019 (ECF No. 24);

10 On May 24, 2019, Plaintiffs filed their First Amended Collective and Class Action
11 Complaint with Jury Demand (ECF No. #25 “Amended Complaint”);

12 On May 28, 2019, the Court denied Defendants’ First Motion to Dismiss as moot in light
13 of Plaintiffs’ Amended Complaint (Dkt. #26);

14 On June 7, 2019, Defendants filed their Motion to Dismiss Plaintiffs’ Amended
15 Complaint (ECF No. 30 “Second Motion to Dismiss”)

16 Pursuant to LR 7-2(b), Plaintiffs currently have until June 21, 2019 (today) to file their
17 response to Defendants’ Second Motion to Dismiss, and Defendants have until June 28, 2019 to
18 file their reply brief in support thereof;

19 On June 21, 2019, counsel for Plaintiffs and Defendants conferred regarding a seven-day
20 extension of Plaintiffs’ deadline to respond to Defendants’ Second Motion to Dismiss, as well as
21 a seven-day extension of Defendants’ deadline to file a reply brief in support thereof, and
22 counsel for Defendants advised they consent to said extensions. The reason for the extensions are
23 not for delay; Plaintiffs’ lead counsel was out of town for the past week, and the extension for
24 Defendants’ reply brief is needed to account for the July 4, 2019 holiday.

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STIPULATION

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendants, through their respective undersigned counsel of record, that:

1. Plaintiffs will have until June 28, 2019 to file their response to Defendants' Second Motion to Dismiss, an extension of 7 days;
 2. Defendants will have until July 12, 2019 to file their reply brief in support of their Second Motion to Dismiss, an extension of 7 days;

IT IS SO STIPULATED.

WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP FOX ROTHSCHILD LLP

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Attorneys for Defendants Mid Valley Enterprises, LLC and Pahrump ICS LLC d/b/a Sheri's Ranch

ORDER

IT IS SO ORDERED.


UNITED STATES DEPARTMENT OF HOMELAND SECURITY
Dated: June 21, 201